

THE ROCKY FLATS LOCAL IMPACTS INITIATIVE

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June 11, 1998

Mr. Fred Gerdeman
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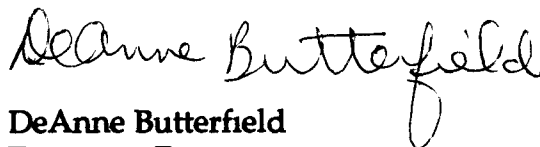
Dear Mr. Gerdeman.

This is a response by the Rocky Flats Local Impacts Initiative to the draft Rocky Flats Decommissioning Program Plan. These comments were authorized by the Rocky Flats Local Impacts Initiative Board of Directors on June 4, 1998. As a regulatory document, the DPP approach appears sound. The process flow and differentiation of types of buildings based on expected contamination also make sense. Our comments relate to the portions of the D&D process that are outside the DPP—specifically deactivation.

The deactivation stage is defined as merely the activities that occur prior to decommissioning, or actions to remove a building from DNFSB jurisdiction. In reality there are many tasks conducted as part of ongoing building landlord functions and in conjunction with removal of chemicals—in both contaminated and clean buildings—that can enhance or detract from later D&D. We strongly recommend that Kaiser-Hill and RFFO develop an internal procedure and definitions that spell out expectations, roles and responsibilities for landlord responsibilities in unused facilities as well as the transition from landlord to D&D. We have observed numerous situations in which lack of information and coordination between Site Operations and D&D have resulted in inefficiencies and even violations of DOE orders. Although the deactivation stage is not regulated by EPA and the State, it nonetheless takes funds from the same cleanup budget and has implications for the actual conduct of D&D. Its success deserves greater attention from both Kaiser-Hill and DOE. We would be pleased to discuss this concept further.

Thank you for the opportunity to comment.

Sincerely,



DeAnne Butterfield
Executive Director

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SW-A-003225